

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LORETTA MERRITT,)	
Plaintiff,)	C.A. NO.:
)	
v.)	
)	
UNITED STATES POSTAL SERVICE,)	
Defendant)	

COMPLAINT & JURY DEMAND

1. The Plaintiff, Loretta Merritt, is an individual residing at 49 Cranberry Road, Buzzards Bay, Barnstable County, Massachusetts.
2. The Defendant, United States Postal Service, is an independent agency of the executive branch of the United States federal government responsible for providing postal service in the United States.
3. On or about March 30, 2018, the Plaintiff, Loretta Merritt, was a patron of one of the Defendant's business premises located at 248 Main Street, Wareham, Plymouth County, Massachusetts.
4. At all material times, the plaintiff was a lawful visitor to the Defendant's premises.
5. The Defendant had a duty to maintain its premises in a reasonably safe condition and free of all foreseeable hazards.
6. On or about March 30, 2018, the Defendant breached its duty by negligently failing to properly maintain said premises in a reasonably safe condition and free of all foreseeable hazards and/or warn of the existence of hazards, including hazards on the steps of the premises.
7. As a direct and proximate result of Defendant's negligence, the Plaintiff was caused to sustain serious personal injury when she was caused to fall on the stairs at the subject premises.
8. As a direct and proximate result of the Defendant's negligence as alleged, the Plaintiff has incurred and continues to incur medical expenses for her care and treatment, and has suffered and continues to suffer an impairment to her ability to enjoy life and attend to her usual activities.
9. At all material times, the Plaintiff was in the exercise of due care and free from all comparative negligence.

10. The Plaintiff has satisfied all conditions precedent to the bringing of this cause of action.

WHEREFORE, the plaintiff demands judgement against the Defendant in the amount of her damages, together with interests, costs and reasonable attorney's fees.

THE PLAINTIFF LORETTA MERRITT CLAIMS AND DEMANDS A TRIAL BY
JURY ON
ALL CAUSES OF ACTION ASSERTED HEREIN.

Respectfully Submitted,
The Plaintiff,
By her Attorney,

Loren E. Laskoski

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